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In the United States District Court Eastern District of Missouri

Raymont Grady Jr.,

Petitioner

Pro-se

Vs.

St. Louis City Justice Center

Respondent

Comes now, Raymont Grady Jr., #34369-044, Pro-se, hereby brings notice of suit against the City of St. Louis Justice Center for violating the petitioner's civil rights under the 8th amendment, from, cruel and unusual punishment, medical neglect, safety and protection neglect, and non-working emergency equipment under the Americans with Disability Act (ADA).

Factual Summary

In the month of December 2019, I, Raymont Grady Jr., was arrested and placed in the St. Louis City Justice Center under a U.S. Marshall hold. After being there for a few days I was sent to the 5th floor (Delta 2) where I was to remain until sentencing. I repeatedly told correctional officers that I felt unsafe in the unit but was repeatedly ignored. I was told "everybody says that so they can get to different floors of the building and to sit and do my time". On the afternoon of January 5, 2020 around 12:30 p.m., unknown inmates repeatedly shouted, "somebody's getting beat today". I felt the tension was toward me, so I pressed the emergency button multiple times but was never responded to. I then took a step out of my cell and was attacked by multiple inmates. Officers never came to my rescue and I do not know how long I was physically assaulted. Around 1:00 p.m., which was lockdown time, C/O Williams came in the unit to lock everyone down and prepare for count. When he got to my cell, I was sitting on the floor with blood pouring from my face and immediately placed in handcuffs. I told him that I could not walk and that I was dizzy, but he ignored me and told me to walk. I was taken to medical, and they wiped my face and put tape on my eye. I told them that my foot was hurting really bad, but they said it

was only a sprain. I was forced to walk to the special housing unit located on the 5th floor where I continued to complain about the pain in my foot. After about another hour I was forced to walk to medical on the second floor where I was sent for my foot to be x-rayed. Seeing that I suffered a broken ankle I was sent to St. Louis University Hospital by ambulance where I was thoroughly evaluated and was told that I suffered a mild concussion, a broken ankle, broken nose, lumps on various parts of my head, and a gash on my left eyebrow that required numerous stitches. Medical records will verify said findings. I was treated then taken back to the St. Louis City Justice Center where I was taken to the infirmary. I was given crutches by the hospital, so the jail denied me a wheelchair when I requested one. I sat in the infirmary for four days (01/05/2020-01/09/2020) and was discharged to general population prematurely. While gathering my belongings, I asked the transporting officer, C/O O'zier, to help carry my things and was told to figure it out because she was not carrying anything. I was again forced to walk on my broken ankle by cruel and careless staff. I was taken to the fourth floor (bravo unit) cell #11, where I was forced to bed on the upper bunk due to being placed in the cell with another disabled inmate. I was refused bags to wrap my cast for the shower, being told that inmates were not allowed to have bags, so as a result my cast continued to get wet and soggy. The handicap shower in the unit was also out of order which forced me to use the regular showers that I had to climb into to get inside. The plaster cast that was originally placed on my foot became so soggy that it became ineffective and almost two weeks later came apart. I hounded staff to send me back to the hospital for a replacement cast but I did not go until February 8, 2020. The orthopedic doctors placed a fiberglass cast on my foot and told my two transporting officers (unknown names) that it was important that I get bags for the shower and to come back in four weeks for a follow-up. I went months without a single follow-up and decided to give this information to my lawyer Federal Public Defender Ms. Felicia Jones who emailed U.S. Marshalls who then emailed the jail. I was repeatedly given the runaround for months. Around June 2020 I was moved from cell #11 to the top tier in cell #20 in retaliation of my continuous complaining. I was forced to climb up and down steps every day until August 2020 when I was moved back to the fifth floor (Charlie unit). I spoke to my lawyer, Ms. Jones, a couple of more times about my cast who in return emailed the U.S. Marshalls. My case was finally removed on September 11, 2020. I was denied physical therapy as well as a boot that was supposed to be worn after the cast was removed. My foot was stuck in the same stiff position for seven months which caused me to lose a lot of needed mobility to that foot. The mobility is almost less than 50% of a normal ankle and was not only caused by the time period of the cast being worn but the abuse by staff as well as being forced to walk on a broken ankle, climb into the top bunk, and walking up the stairs.

Relief Sought

- 1) I seek that the St. Louis City Justice Center makes repairs to the emergency buttons on the fifth floor located in the cells and retrain staff to respond to those buttons.
- 2) I seek that the St. Louis City Justice Center makes it a must that their staff be as professional as possible. Learn how to deal with medical emergencies and disabilities, the placement of inmates with specific medical needs.

- 3) I seek monetary damages in the amount of one million dollars, punitive damages to be awarded by the trial court or judge for the physical and mental pain and inhumane suffering that I endured from the failure of safety and protection that the jail staff failed to uphold.

Legal Authority

Federal prisoners may seek relief for pain and suffering under the 8th amendment of the United States Constitution. Prisoners are required by law to have certain rights while in custody. Those rights are but not limited to:

- 1) To be kept safe while in custody.
- 2) To have medical needs attended to and met, to prevent further injuries from the lack of treatment.
- 3) Offenders are required to be given every accommodation, if disabled, under the ADA act.

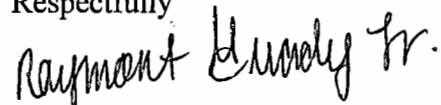
Because of the lack of follow-up care from the jail, I now have a permanent disability of the right ankle. Had I been treated with care, respect, and had been taken to my follow-up appointments, my ankle would be of full usage. The St. Louis City Justice Center failed not only my safety and protection but also my physical well-being.

This court has legal jurisdiction over the said respondent (St. Louis City Justice Center) being located at 200 S Tucker Blvd St. Louis, MO 63102.

Conclusion

The petitioner, Raymont Grady Jr., Pro-se, requests to place this lawsuit on the St. Louis City Justice Center, on the earliest trial setting of the court.

Respectfully



Raymont Grady Jr.

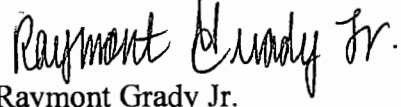
Petitioner

Pro-se

Certificate of Service

I, Raymont Grady Jr., Petitioner Pro-se hereby declare under the penalties of perjury that I placed the original copy of the lawsuit in the US postal mailbox for outgoing mail to the clerk of the court for the Eastern District of Missouri. Date: March 31, 2021

Respectfully submitted


Raymont Grady Jr.

Petitioner

Pro-se

Service information

Inmate: Raymont Grady Jr. #34369-044

United States Penitentiary Big Sandy

1197 Airport Road

Inez, KY 41224